REMARKS

Claims 1-20 are pending in this Application. Applicant has amended claim 1 to define the claimed invention more particularly, and amended claims 3-5 and 7-20 in response to the Examiner's objections to the claims. No new matter is added.

It is noted that the claim amendments are made only for more particularly pointing out the invention, and not for distinguishing the invention over the prior art, narrowing the claims or for any statutory requirements of patentability. Further, Applicant specifically states that no amendment to any claim herein should be construed as a disclaimer of any interest in or right to an equivalent of any element or feature of the amended claim.

Claims 2-11, 13, 15, 16, 18, and 19 are allowed.

Applicant gratefully acknowledges the Examiner's indication that claims 12 and 17 would be allowable if rewritten in independent form. However, for at least the reasons discussed below, Applicant respectfully submits that all claims herein are allowable.

Claims 1 and 14 stand rejected under 35 U.S.C. §102(e) as being anticipated by Hurtta et al. (US 6,975,850, and hereinafter "Hurtta"). Claims 1, 14, and 20 stand rejected under 35 U.S.C. §102(e) as being anticipated by Peterson (US 6,574,221).

Applicant respectfully traverses these rejections in the following discussion.

I. THE CLAIMED INVENTION

The claimed invention (e.g., as defined by exemplary claim 1) is directed to a mobile communication network system.

The mobile communication network system includes a mobile communication network, a plurality of external networks, a plurality of mobile terminals, a plurality of gateways for connecting the external networks and the mobile communication network, and

a plurality of radio access points for connecting the mobile terminals to the mobile communication network. When packets are transmitted and received between the mobile terminals, the packets are communicated by way of virtual networks that are provided to correspond to each of the external networks on the mobile communication network. The mobile communication network is provided with the virtual networks that correspond to each of the external networks. Each of the external networks includes a mobility management

node and a home network authentication server.

With this structure, packets no longer need to be transferred by way of external network gateways, and the efficiency of circuit use of the access network could be improved (e.g., see Application at page 5, lines 18-20).

II. THE PRIOR ART REJECTIONS

A. The Hurtta Reference

The Examiner alleges that Hurtta teaches claims 1 and 14.

Applicant respectfully submits, however, that the alleged reference does not teach or suggest each and every feature of the claimed invention.

That is, Hurtta does not teach or suggest, "*wherein each of said external networks comprises a mobility management node and a home network authentication server,*" as recited in claim 1.

Indeed, in the personal interview conducted on August 12, 2010, the Examiner agreed that Hurtta fails to teach or suggest this feature of the claimed invention.

Furthermore, Applicant submits that Hurtta does not teach or suggest, "*when packets are transmitted and received between said mobile terminals, the packets are communicated by way of virtual networks that are provided to correspond to each of said external networks on said mobile communication network, and wherein said mobile communication network is provided with said virtual networks that correspond to each of said external networks,*" (emphasis added by Applicant) as recited in claim 1.

Indeed, in Hurtta, a mobile terminal (in a mobile communication network) communicates with a mobile terminal in an external network.

On the other hand, in the claimed invention, mobile terminals in a mobile communication network communicate with each other. Therefore, Hurtta fails to teach or suggest claim 1.

Therefore, the Applicant respectfully submits that Hurtta fails to teach or suggest each element of Applicant's claimed invention. Therefore, Applicant respectfully requests the Examiner to reconsider and withdraw this rejection.

B. The Petersen Reference

The Examiner alleges that Petersen teaches claims 1, 14, and 20.

Applicant respectfully submits, however, that the alleged reference does not teach or suggest each and every feature of the claimed invention.

That is, Petersen does not teach or suggest, "*wherein each of said external networks comprises a mobility management node and a home network authentication server,*" as recited in claim 1.

Indeed, in the personal interview conducted on August 12, 2010, the Examiner agreed that Petersen fails to teach or suggest this feature of the claimed invention.

Furthermore, Applicant submits that Petersen does not teach or suggest, "*wherein said mobile communication network is provided with said virtual networks that correspond to each of said external networks,*" as recited in claim 1.

Indeed, there is no description or suggestion in Petersen indicating that the invention is provided with virtual networks that correspond to each of the external networks, as recited in claim 1.

On the other hand, in the claimed invention, the mobile communication network is provided with virtual networks that correspond to each of the external networks.

Therefore, Petersen cannot optimize the path of packets that is used by mobile terminals to communicate with each other in a mobile communication network.

Further, referring to Fig. 6, col. 8, line 43-55, and the paragraph that includes the term "virtual" in Petersen, there is no description or suggestion of a virtual network in the alleged reference.

Indeed, Petersen in col. 8, lines 47-50 discloses, "*Virtually any Infocom network may be interfaced for communications with the mobile stations 128 through an appropriate Infocom access network node(s).*" According to this description, since nodes are determined to correspond to each of the external networks, the alleged reference does not teach or suggest the virtual network.

In the case of the virtual network, one node relays the traffic of a plurality of external networks and separates the traffic using the identifier of the virtual network. Petersen does not provide a description or a suggestion similar to the above description. Thus, Petersen fails to teach or suggest claim 1.

Therefore, the Applicant respectfully submits that Petersen fails to teach or suggest each element of Applicant's claimed invention. Therefore, Applicant respectfully requests the Examiner to reconsider and withdraw this rejection.

III. FORMAL MATTERS AND CONCLUSION

Applicant has amended the claims in a manner believed responsive to the Examiner's claim objections.

In view of the foregoing, Applicant submits that claims 1-20, all the claims presently pending in the application, are patentably distinct over the prior art of record and are in condition for allowance. The Examiner is respectfully requested to pass the above application to issue at the earliest possible time.

Should the Examiner find the application to be other than in condition for allowance, the Examiner is requested to contact the undersigned at the local telephone number listed below to discuss any other changes deemed necessary in a telephonic or personal interview.

The Commissioner is hereby authorized to charge any deficiency in fees or to credit any overpayment in fees to Attorney's Deposit Account No. 50-0481.

Respectfully Submitted,

Date: 09/01/10

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